

IN THE CHANCERY COURT FOR SULLIVAN COUNTY, TENNESSEE
SECOND JUDICIAL DISTRICT AT BRISTOL

STATE OF TENNESSEE, *ex rel.*
ROBERT E. COOPER, JR., ATTORNEY
GENERAL and REPORTER,

Plaintiff,

v.

GINA DE'LYNN HODGES PRICE,
JEFFREY ADAM PRICE, WILLIAM DOUG
PICKEL, and ALLISON PAGE BAIRD,
individually and collectively doing business
as REBEL RIDGE KENNELS, CSA
BULLDOGS, and CONFEDERATE SANDS,
Defendants.

No. C0016896

Chancellor E. G. Moody

AGREED ORDER FINDING GINA PRICE IN CIVIL CONTEMPT AND CONTINUING
HEARING ON MONETARY REMEDIES

Comes now the State of Tennessee, through its Attorney General and Reporter, and the Defendant, Gina De'Lynn Hodges Price, through counsel, and jointly submit an Agreed Order finding Gina Price in civil contempt of this Court's previously issued "Agreed Order for Temporary Injunction and Appointment of Receiver for Gina De'Lynn Hodges Price" and continuing a hearing on monetary penalties, of such contempt as well as attorneys' fees and court costs, if any is awarded, until after the conclusion of a concurrent federal criminal trial scheduled to begin on June 30, 2008.

STIPULATIONS OF FACT

The parties jointly stipulate to the following set of facts:

1. On May 24, 2006, in response to the State's initial Motion to Enforce its

TIME 1:15 p.m.
SARAH HOUDEWRIGHT
CLERK OF MASTER
BY [Signature]

Temporary Restraining Order, Defendant Gina Price submitted an affidavit to the Court that stated in relevant part:

I closed down my web site(s) the day of the temporary injunction to the best of my knowledge. I had all the web sites mentioned in the case (CSABulldogs.com, ConfederateSands.com, and RebelRidgeKennels.com) all directed to RebelRidgeKennels.com and I changed the index page of RebelRidgeKennels.com to show NO ADVERTISEMENTS. This was all I knew how to do and as soon as I was informed by the State that there were other pages still showing on line that I had no knowledge of, I called Homestead.com and had them close my entire account until this matter is resolved.

2. Gina Price in her Response to the State's Requests for Admissions, which she filed with this Court, stated in relevant part:

[Admission] Defendant Gina Price puts up and takes down web pages located within the following web addresses either by herself or through an agent:

(a) www.rebelridgekennels.com . . .

ANSWER: Yes to all, but they were always checked over by others, such as Patsy Gobble, Page Baird, Adam Price and Terry Sharp. Sometimes my internet friends would let me know there was [sic] mistakes here and there on them and I would go and correct them.

3. Along with the other Defendants, Gina Price admitted to purchasing the domain name www.rebelridgekennels.com in her Response to the State's Verified Complaint. Defendant Gina Price's notarized signature appears on the second to last page of her Response to the State's Complaint.

4. On June 22, 2006, following the issuance of a *sua sponte* Temporary Restraining Order, the parties entered into an Agreed Order for Temporary Injunction and Appointment of a Receiver for Defendant Gina De'Lynn Hodges Price, individually and doing business as Rebel Ridge Kennels, CSA Bulldogs, and Confederate Sands.

Among other things, the Order prohibits Ms. Price from:

- (A) Offering for sale or selling any dog to any consumer or the public;
- (B) Advertising or promoting in any manner or medium any dog to any consumer; and
- (C) Operating or otherwise hosting any website, e-bay offering or other Internet service, or otherwise to sell dogs to any consumer or the public.

5. On four occasions, July 19, 2006, July 20, 2006, August 24, 2006, and August 30, 2006, Gina Price was notified through counsel that web pages that she owned were not in compliance with the Agreed Order for Temporary Injunction and Appointment of a Receiver for Defendant Gina De'Lynn Hodges Price, including but not limited to:

www.rebelridgekennels.com/thefrenchconnection.html
www.rebelridgekennels.com/links1.html
www.rebelridgekennels.com/pups2.html
www.rebelridgekennels.com/imports.html
www.rebelridgekennels.com/import2.html
www.rebelridgekennels.com/belles2.html
www.thefrenchconnection.org/pups1.html
www.rebelridgekennels.homestead.com/untitled8.html
rebelridgekennels.homestead.com/links666.html

6. On or about January 21, 2008, Gina Price posted her website online under the uniform resource locator ("URL") www.rebelridgekennels.com/index3.html. This website including the sublinks "Southern Belles," "Southern Gentelmen" [sic], "Kennel News," and "Facts About AKC and FCI" was available to be accessed by the general public if the user knew uniform resource locator address.

7. Sometime on or after January 21, 2008, Gina Price offered the following dogs for sale on her web site: Cleo, Dixie, Savannah, Tamiامي, Azora, Lilly, and Rhett.

8. In addition, sometime on or after January 21, 2008, Ms. Price stated on her

website in the "Kennel News" section:

We have decided to sell some of our belles here on the Ridge (see their photos on my Southern Belles Page). We are going to be too busy to breed them when they come in heat in 2008 , and feel they should be breed [sic] if they are to be by then due to it being their 2nd and 3rd heats (some of them have not been breed [sic] yet and are just now ready to be breed [sic] in 2008). Please check them out and give us a call if interested in any of them . Our home number is 423-323-8484 or you can call our mobile number 423-384-6977 anytime and leave a message and we will return your call ASAP.

9. On or after January 21, 2008, Ms. Price has also stated on her website:

If you have any questions please feel free to call us at : 423-323-8484 (home) or (423) 384-6977 (mobile) anytime . . . We look forward to hearing from you , and providing you with a loving little one to snuggle with for many years to come . Oh yeah , here are two links for you to compare for yourself before you choose which pup you like best.

10. The phone number for Gina Price's residence at 358 Rodefer Hollow Road is (423) 323-8484. The cell phone number (423) 384-6977 belongs to Gina Price.

IT IS SO STIPULATED.

REPRESENTATION AND WARRANTY THAT NO DOGS WERE SOLD

11. Defendant Gina Price represents and warrants that although she advertised dogs for sale, she did not in fact sell any dogs to any consumer since entry of the Agreed Order for Temporary Injunction and Appointment of Receiver for Gina Price. By entering this Agreed Order, Defendant Gina Price understands that the State has relied on this representation and warranty, the State reserves the right to seek additional sanctions should it determine that the above representation and warranty is false or misleading.

IT IS SO REPRESENTED.

NON-COMPLYING WEBSITES WILL BE TAKEN DOWN

12. Defendant Gina Price has removed, taken down, or otherwise prevented and will

continue to remove, take down, or otherwise prevent access to the public of any website, including www.rebelridgekennels.com/index3.html, that is not in compliance with the previously entered Agreed Order for Temporary Injunction and Appointment of a Receiver for Gina De'Lynn Hodges Price.

IT IS SO ORDERED, ADJUDGED, AND DECREED.

CONTINUANCE OF HEARING ON MONETARY PENALTIES

13. By agreement of Gina Price and the State, the Court hereby finds Gina Price in civil contempt of the Court's prior order dated June 22, 2006, based upon the stipulations set forth herein. The portion of the civil contempt hearing relating to the payment of monetary penalties, if any are awarded, for civil contempt as well as attorneys' fees and court costs is continued until after the conclusion of the concurrent federal criminal trial currently scheduled to begin on June 30, 2008.

IT IS SO ORDERED, ADJUDGED, AND DECREED.

FINANCIAL INFORMATION STATEMENT

14. Defendant Gina Price agrees to complete, under penalty of perjury, the Financial Statement of Individual Defendant attached as Attachment A this Agreed Order and submit to the Attorney General at least three (3) business days prior to the hearing on monetary remedies.

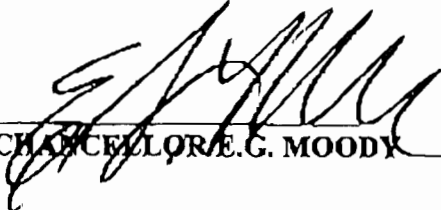
IT IS SO ORDERED, ADJUDGED, AND DECREED.

**NO EFFECT ON AGREED ORDER FOR TEMPORARY INJUNCTION AND
APPOINTMENT OF RECEIVER FOR GINA DE'LYNN HODGES PRICE**

15. The Agreed Order for Temporary Injunction and Appointment of Receiver for Gina De'Lynn Hodges Price shall remain in full force and effect.

IT IS SO ORDERED, ADJUDGED, AND DECREED.

THIS THE _____ day of May, 2008



CHANCELLOR E. G. MOODY

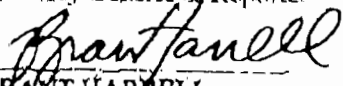
05/29/2008 14:49 6157412009
05/16/2008 06:38 4232793280
05/22/2008 11:56 4232453362

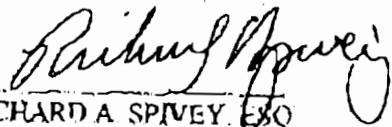
TN ATTORNEY GENERAL
CHANCERY COURT
SPIVEY

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Jointly submitted,

ROBERT E. COOPER, JR.
Attorney General & Reporter


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Assistant Attorney General
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Kingsport, TN 37660
(423) 245-4185
(423) 245-3362 (fax)

Attorney for Defendant Gina Price


GINA DE'LYNN HODGES PRICE

CERTIFICATE OF SERVICE

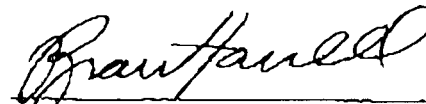
I do hereby certify that a copy of the foregoing Motion to Enforce the Agreed Temporary Injunction Order Against Defendant Gina De'Lynn Hodges Price will be served by **US Mail** and also by facsimile where available, to:

J. WESLEY EDENS, ESQ.
Icenhour & Edens Law Firm
900 Anderson Street, Suite B
Bristol, Tennessee 37620

ALLISON PAGE BAIRD
1487 Ryder Church Road
Bluff City, TN 37618

WILLIAM DOUG PICKEL
358 Rodefer Hollow Road
Blountville, TN 37617

On this the 22 day of May, 2008.


GRANT HARRELL
Assistant Attorney General

120099

05/29/2008 14:49 6157412009
05/16/2008 06:38 4232793280

TN ATTORNEY GENERAL
CHANCERY COURT

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ATTACHMENT A
FINANCIAL STATEMENT SHEET

ATTACHMENT "A"

FINANCIAL STATEMENT OF INDIVIDUAL DEFENDANT

Instructions:

Complete all items. Enter "None" or "N.A." ("Not Applicable") where appropriate. If you cannot fully answer a question, explain why. "Assets" and "Liabilities" include ALL assets and liabilities, located within the United States or elsewhere, whether held individually or jointly. Attach additional pages as necessary to answer all questions fully. Initial each page in the space provided in the lower right corner. Sign and date the completed financial statement on the last page.

BACKGROUND INFORMATION

Item 1. Information About You

Your Full Name _____ Social Security # _____
Current Address _____ From (Date) _____
Identify any other name(s) and/or social security number(s) you have used, and the time period(s) during which they were used _____ Marital status _____

Item 2. Information About Spouse, Dependents

► Name _____ Date of Birth _____
Relationship _____ Social Security No. _____

► Name _____ Date of Birth _____
Relationship _____ Social Security No. _____

Item 3. Employment Information

Provide the following information for this year-to-date and for each of the previous three full years, for each company of which you were a director, officer, employee, agent, or consultant at any time during that period.

► Company Name & Address _____
Position Held and Dates Employed: _____

► Company Name & Address _____
Position Held and Dates Employed: _____

► Company Name & Address _____
Position Held and Dates Employed: _____

FINANCIAL INFORMATION: ASSETS AND LIABILITIES

REMINDER: "Assets" and "Liabilities" include ALL assets and liabilities, located within the United States or elsewhere, whether held individually or jointly.

Item 4. Safe Deposit Boxes

List all safe deposit boxes, located within the United States or elsewhere, held by you, your spouse, or any of your dependents, or held by others for the benefit of you, your spouse, or any of your dependents. *On a separate page, describe the contents of each box.*

Owner's Name	Name & Address of Depository Institution	Box No.

Item 5. Cash, Bank Accounts, Money Market Accounts, Certificates of Deposit

List cash and all bank accounts, money market accounts, certificates of deposit, held by you, your spouse, or your dependents, or held by others for the benefit of you, your spouse, or your dependents. The term "cash" includes currency and uncashed checks.

Cash on Hand \$ _____ Cash Held for Your Benefit \$ _____

<u>Name on Account</u>	<u>Name & Address of Financial Institution</u>	<u>Account No.</u>	<u>Current Balance</u>

Item 6. Publicly Traded and Government Securities

List all securities, including but not limited to, stocks, stock options, registered and bearer bonds, state and municipal bonds, and mutual funds, held by you, your spouse, or your dependents, or held by others for the benefit of you, your spouse, or your dependents. In the alternative, attach the most recent brokerage statement for each account.

<u>Name of Security</u>	<u># of units owned</u>	<u>Owner of security</u>	<u>Location of Security</u>	<u>Current Value</u>

Item 7. Other Business Interests

List all other business interests, including but not limited to, non-public corporations, general or limited partnership interests, sole proprietorships, and oil and mineral leases, in which you, your spouse, or your dependents, are an officer, director, or have an ownership interest.

Business Format _____ Business' Name & Address _____
Ownership % _____ Officer/Director _____
Owner (e.g., self, spouse) _____ Current Fair Market Value \$ _____

Business Format _____ Business' Name & Address _____
Ownership % _____ Officer/Director _____
Owner (e.g., self, spouse) _____ Current Fair Market Value \$ _____

Item 8. Amounts Owed to You, Your Spouse, or Your Dependents

List all amounts owed to you, your spouse, or your dependents.

Debtor's Name, Address, & Telephone No. _____
Original Amount Owed \$ _____ Current Amount Owed \$ _____ Monthly Payment \$ _____

Item 9. Personal Property

List all personal property, by category, whether held for personal use or for investment, including but not limited to, furniture and household goods of value, computer equipment, electronics, coins, stamps, artwork, gemstones, jewelry, bullion, other collectibles, copyrights, patents, and other intellectual property, held by you, your spouse, or your dependents, or held by others for the benefit of you, your spouse, or your dependents.

Item 9. continued.

<u>Property Category</u> (e.g., artwork, jewelry)	<u>Name of Owner</u>	<u>Property Location</u>	<u>Acquisition Cost</u>	<u>Current Value</u>
			\$	\$
			\$	\$
			\$	\$
			\$	\$

Item 10. Cars, Trucks, Motorcycles, Boats, Airplanes, and Other Vehicles

List all cars, trucks, motorcycles, boats, airplanes, and other vehicles owned or operated by you, your spouse, or your dependents, or held by others for the benefit of you, your spouse, or your dependents.

• Vehicle Type _____ Make _____ Model _____ Year _____
Registered Owner's Name _____ Registration State & No. _____
Current Value \$ _____ Current Loan Balance \$ _____ Monthly Payment \$ _____

• Vehicle Type _____ Make _____ Model _____ Year _____
Registered Owner's Name _____ Registration State & No. _____
Current Value \$ _____ Current Loan Balance \$ _____ Monthly Payment \$ _____

• Vehicle Type _____ Make _____ Model _____ Year _____
Registered Owner's Name _____ Registration State & No. _____
Current Value \$ _____ Current Loan Balance \$ _____ Monthly Payment \$ _____

Item 11. Real Property

List all real estate held by you, your spouse, or your dependents, or held by others for the benefit of you, your spouse, or your dependents.

• Type of Property _____ Property's Location _____
Name(s) on Title and Ownership Percentages _____
Current Value \$ _____ Balance On First Mortgage \$ _____ Monthly Payment \$ _____
Other Loan(s) (describe) _____ Current Balance \$ _____
Monthly Payment \$ _____ Rental Unit? _____ Monthly Rent Received \$ _____

• Type of Property _____ Property's Location _____
Name(s) on Title and Ownership Percentages _____
Current Value \$ _____ Balance On First Mortgage \$ _____ Monthly Payment \$ _____
Other Loan(s) (describe) _____ Current Balance \$ _____
Monthly Payment \$ _____ Rental Unit? _____ Monthly Rent Received \$ _____

Item 12. Credit Cards

List each credit card held by you, your spouse, or your dependents. Also list any other credit cards that you, your spouse, or your dependents use.

<u>Name of Credit Card (e.g., Visa, MasterCard, Department Store)</u>	<u>Account No.</u>	<u>Name(s) on Account</u>	<u>Current Balance</u>	<u>Minimum Monthly Payment</u>
			\$	\$
			\$	\$
			\$	\$
			\$	\$

Item 13. Loans and Liabilities

List all loans or liabilities in your, your spouse's, or your dependents' names.

Name & Address of Lender/Creditor _____
Name(s) on Liability _____
Nature of Liability _____
Date of Liability _____ Amount Borrowed \$ _____ Current Balance \$ _____
Payment Amount \$ _____ Frequency of Payment _____

Name & Address of Lender/Creditor _____
Name(s) on Liability _____
Nature of Liability _____
Date of Liability _____ Amount Borrowed \$ _____ Current Balance \$ _____
Payment Amount \$ _____ Frequency of Payment _____

OTHER FINANCIAL INFORMATION

Item 14. Tax Returns

List all federal tax returns that were filed during the last three years by or on behalf of you. Provide a copy of each signed tax return that was filed during the last three years.

<u>Tax Year</u>	<u>Refund Expected</u>
_____	\$ _____
_____	\$ _____
_____	\$ _____

Item 15. Transfers of Assets

List each person to whom you have transferred, in the aggregate, more than \$5000 in funds or other assets during the previous three years by loan, gift, sale, or other transfer. For each such person, state the total amount transferred during that period.

<u>Transferee's Name, Address, & Relationship</u>	<u>Property Transferred</u>	<u>Aggregate Value</u>	<u>Transfer Date</u>	<u>Type of Transfer (e.g., Loan, Gift)</u>
_____	_____	\$ _____	_____	_____
_____	_____	\$ _____	_____	_____
_____	_____	\$ _____	_____	_____
_____	_____	\$ _____	_____	_____
_____	_____	\$ _____	_____	_____

SUMMARY FINANCIAL SCHEDULES

Item 16. Combined Balance Sheet for You, Your Spouse, and Your Dependents. "You" includes yourself, your spouse, and your dependents.

ASSETS

LIABILITIES

Cash on Hand \$ _____

Cash in Financial Institutions \$ _____

Securities \$ _____

Other Business Interests \$ _____

Amounts Owed to You \$ _____

Personal Property You Own \$ _____

Value of Vehicles, Boats, Airplanes You Own \$ _____

Value of Real Property You Own \$ _____

Other Assets You Own (Itemize) \$ _____

\$ _____

\$ _____

\$ _____

Total Assets \$ _____

Credit Cards Balances \$ _____

Motor Vehicles, Boats, Airplanes - Liens \$ _____

Real Property - Mortgages \$ _____

Loans Against Securities \$ _____

Taxes Owed by You \$ _____

Other Loans and Liabilities (Itemize) \$ _____

\$ _____

\$ _____

\$ _____

\$ _____

Total Liabilities \$ _____

Item 17. Combined Average MONTHLY Income and Expenses for You, Your Spouse, and Your Dependents for the Last 6 Months

Provide the average monthly income and expenses for you, your spouse, and your dependents for the last 6 months. Do not include credit card payments separately; rather, include credit card expenditures in the appropriate categories.

INCOMEEXPENSES

Salary - After Taxes	\$ _____	Mortgage Payments for Residence(s)	\$ _____
Fees, Commissions, and Royalties	\$ _____	Property Taxes for Residence(s)	\$ _____
Interest	\$ _____	Rental Property Expenses, Including Mortgage Payments, Taxes, and Insurance	\$ _____
Dividends and Capital Gains	\$ _____	Car or Other Vehicle Lease or Loan Payments	\$ _____
Gross Rental Income	\$ _____	Food Expenses	\$ _____
Profits from Sole Proprietorships	\$ _____	Clothing Expenses	\$ _____
Distributions from Partnerships, S-Corporations, and LLCs	\$ _____	Utilities	\$ _____
Distributions from Trusts and Estates	\$ _____	Medical Expenses, Including Insurance	\$ _____
Social Security Payments	\$ _____	Other Insurance Premiums	\$ _____
Alimony/Child Support Received	\$ _____	Other Transportation Expenses	\$ _____
Other Income (Itemize)		Other Household Expenses	\$ _____
_____	\$ _____	Other Expenses (Itemize)	
_____	\$ _____	_____	\$ _____
_____	\$ _____	_____	\$ _____
_____	\$ _____	_____	\$ _____
_____	\$ _____	_____	\$ _____
Total Income	\$ _____	Total Expenses	\$ _____

I am submitting this financial statement with the understanding that it may affect action by the Tennessee Attorney General or a state court. I have used my best efforts to obtain the information requested in this statement. The responses I have provided to the items above are true and contain all the requested facts and information of which I have notice or knowledge. I certify under penalty of perjury under the laws of the United States and the State of Tennessee that the foregoing is true and correct.

Executed on:

Name:

(Date)

Signature